WEST VIRGINIA

DEPARTMENT OF ENVIRONMENTAL PROTECTION

STATEMENT OF BASIS

Chemours Company FC, LLC (Chemours)
BELLE, WEST VIRGINIA

EPA ID NO. WVD 005012851

May 2015

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I. Introduction

The West Virginia Department of Environmental Protection (DEP) has prepared this Statement of Basis (SB) to solicit public comment on its proposed remedy for the Mountain Area Chemours Company FC, LLC (Belle) Facility located in Belle, West Virginia (Facility or Site). DEP's proposed remedy for the Mountain Area consists of storm water management, groundwater monitoring, engineering controls consisting of capping, fencing, and institutional controls to implement land and groundwater use restrictions.

The Facility is subject to the United States Environmental Protection Agency's (EPA) Corrective Action program under the Solid Waste Disposal Act, as amended, commonly referred to as the Resource Conservation and Recovery Act (RCRA), 42 U.S.C. Section 6901, et seq. The Corrective Action program requires that facilities subject to certain provisions of RCRA investigate and address releases of hazardous waste and hazardous constituents, usually in the form of soil or groundwater contamination, that have occurred at or from their properties.

DEP is providing a thirty (30) day public comment period on this SB. DEP may modify its proposed remedy based on comments received during this period. DEP will announce its selection of a final remedy for the Mountain Area of the Facility in a Final Decision and Response to Comments (Final Decision) after the public comment period has ended.

DEP will make a decision after considering all comments received during the comment period, consistent with applicable RCRA requirements and regulations. If the decision is substantially unchanged from the one proposed, DEP will issue a final decision and inform all persons who submitted written comments or requested notice of DEP's final determination. If the final decision is significantly different from the one proposed, DEP will issue a public notice explaining the new decision and will reopen the comment period. In the Response to Comments section attached to the Final Decision, DEP will respond in writing to each comment received.

Information on the Corrective Action program as well as a fact sheet for the Facility can be found by navigating http://www.epa.gov/reg3wcmd/correctiveaction.htm.

II. Facility Background

Site History

Effective February 1, 2015, ownership of the Belle plant site was transferred to Chemours Company FC, LLC (Chemours) via a corporate reorganization of the DuPont Performance Chemicals businesses currently owned and operated by DuPont. Chemours will become a totally separate publicly traded company on July 1, 2015.

The Facility is located at 901 West DuPont Avenue, Belle, West Virginia, on approximately 723 acres. It is situated in the floodplain of the Kanawha River, northwest of the town of Belle in Kanawha County, West Virginia and is eight miles southeast of Charleston, West Virginia, along Route 60 (see Figure 1). The site is located on the north bank of the Kanawha River. The Belle Plant is divided into two areas, the Plant Area and the Mountain Area, based on topography and land use. This SB focuses on the Mountain Area only.

The 618-acre Mountain Area does not include any manufacturing or process areas. Before the late 1970s, most wastes generated at the Belle Plant were disposed of in the Mountain Area. The topography in the vicinity of the Mountain Area is very pronounced, consisting of narrow, winding valleys, and steep ridges. The topography is sufficiently severe to influence some of the balancing factors used in evaluating potential remedies.

A. Site Geology

The Belle Mountain Area lies within the outcrop area of the Middle Pennsylvanian-aged Kanawha and Charleston Formations of the Pottsville series. These formations are characterized by a sequence of interbedded sandstones, siltstones, claystones, shales, and coal seams.

The Kanawha Formation occurs between 200 and 1,330 feet above mean sea level in the vicinity of the site. It is characterized by ten, thick (20 to 100 feet) sandstone units separated by shale and claystone units that contain coal beds. The sandstone units are massively-bedded, well-cemented, fractured sandstones that vary from coarse pebble conglomerates to fine-grained sandstones. The shale and claystone units typically vary in thickness from 20 to 50 feet and are also fractured. The coal units, which most commonly occur fully within the shale units, are typically thin (1 to 5 feet thick), highly fractured, and usually occur as semi-bituminous or bituminous coals.

Sediments above the bedrock in the central area of the Mountain Area (Scotts Run Hollow) consist of large quantities of fill and much smaller portions of alluvial deposits or residual regolith (DuPont CRG, 1999). Plant expansion over the years resulted in the construction of various areas for management of solid waste. These areas required channelizing in Scotts Run stream, which currently flows through a culvert before discharging to Simmons Creek. The Mountain Area's interior valley is comprised primarily of the Scotts Run Hollow fill. The fill consists of fly ash, cinders, anaerobic sludge, construction rubble, and gravels. These fill materials were placed from 1943 to 1978 when Scotts Run Hollow was an active part of the Belle operations.

B. Hydrology and Hydrogeology

Groundwater

There are six aquifers in the Mountain Area that occur at or below the elevation of the Mountain Area SWMUs. The Mountain Area overburden aquifer (the shallowest aquifer) is comprised of saturated fill and natural soil in Scotts Run Hollow and alluvium in Simmons Creek. The five underlying sandstone bedrock aquifers, from shallowest to deepest, are designated E Zone, D Zone, C Zone, B Zone, and A Zone. These aquifers are separated from each other by shale, sandy shale, and claystone aquitards. Groundwater flow in these units can be inferred by using the available well data and assumptions about the local discharge points along the outcrop belts of the individual sandstone units. Each of the upper zones (E, D, C, and B Zones) is recharged by local rainfall that percolates downward through the overlying zones. In general, groundwater flow in the upper aquifers (E, D, C, and B) is believed to roughly follow a denuded expression of the surface topography, being elevated below the topographic ridges and flowing towards seepage faces created at the outcrops. Flow within the C and B Zones in the center of Scotts Run Hollow is generally radial and outward from the location of SWMU 171,

the Anaerobic Pond, toward the adjacent ridges in response to mounding created by the pond, which is located in the center of the upper portion of Scotts Run Hollow. Groundwater flow in the lowest unit of interest (A Zone) is generally from east to west where it discharges to the Kanawha River Valley bottom, which is the regional discharge feature.

Surface Water

Surface-water features in the Mountain Area include the Anaerobic Pond, Scotts Run Stream, and Simmons Creek. Surface water from storm events flows into the Anaerobic Pond as well as into Scotts Run Stream and Simmons Creek. Scotts Run Stream intersects Simmons Creek, which then crosses onto the Belle Plant Area, with surface water ultimately discharging into the Kanawha River.

III. Summary of Environmental History

In September 1998, the EPA issued the Corrective Action portion [Hazardous and Solid Waste Amendments (HSWA) permit] of the RCRA Permit (Permit # WVD 005 012 851) for the DuPont Belle Plant. The permit was renewed in March 2014 by DEP. (Permit will be revised to incorporate the final decision once it is issued to the facility.

The Belle Plant consists of two distinct areas: the Mountain Area and the Plant Area. The RCRA Facility Investigation (RFI) for the Mountain Area is complete [DuPont Corporate Remediation Group (CRG), 2009 and URS, 2011]. The last phase of the RFI included conducting a Screening Level Ecological Risk Assessment (SLERA; URS, 2013a). The SLERA was submitted to the EPA in January 2013. The Phase IIIB RFI Report and the SLERA were approved by EPA on March 7, 2013. Upon completion of the RFI, DuPont was required to submit a CMS work plan for the Mountain Area, pursuant to Part II, Condition D.1 and Attachment D of the Permit.

The CMS work plan was submitted to EPA in April 2013 and was revised based on comments from EPA and resubmitted in June 2013 (URS, 2013b). The June 2013 CMS work plan, approved by EPA on June 14, 2013, recommended that the following solid waste management units (SWMUs) be carried forward in the CMS:

- SWMU 162 – Former Waste Retention Reservoir
- SWMU 163 – Inactive Landfill and Liquid Incinerator
- SWMU 164 – Inactive Disposal Area 3
- SWMU 165 – Inactive Disposal Area 4 – (13-Turn Landfill)
- SWMU 167 – Former Upper Waste Retention Pond
- SWMU 168 – Glycol Pit
- SWMU 170 – Former Plant Trash Incinerator

A. RCRA Facility Investigations

The Mountain Area consists of 618 acres of narrow, winding valleys and steep ridges. The area currently contains closed waste disposal areas and future usage will not change. Routine activities do not occur in this area. Additionally, all of the Mountain Area SWMUs are fenced and guarded, and access is controlled and limited to authorized personnel only. The Mountain Area is surrounded on the southeast through the northwest by locally populated rural

residential areas, hollows and open, forested areas scattered with oil and gas wells. Based on information in a well/water use survey, groundwater is not generally used for drinking water on or near the site, including in Burning Springs Hollow, a residential area located northwest of the Mountain Area. Although municipal water is available in Upper Simmons Creek Hollow, located to the northeast of the Mountain Area, some of the residences in Upper Simmons Creek Hollow do use the shallow overburden groundwater for drinking water; however, the shallow aquifer is located above the site's impacted bedrock aquifers. In addition, groundwater gradients at the eastern portion of the Mountain Area indicate that groundwater flows to the south and southwest toward Scotts Run Hollow and away from Upper Simmons Creek Hollow. Thus, no significant potentially complete human exposure pathways were identified for groundwater.

To the southwest, adjacent to the Mountain Area is the Belle Plant, with the Kanawha River running the length of the plant along its southwestern boundary. The Kanawha River in the vicinity of the Belle Plant is designated by West Virginia for the Propagation and Maintenance of Fish and Other Aquatic Life (Category B) and for Water Contact Recreation (Category C). The river has a variance and cannot be used as a public water supply (Category A), and the Kanawha River is not a drinking-water source in the Charleston area. Water contact recreation includes swimming, boating, and fishing. Land access to the river in the vicinity of the Belle Plant is limited due to site security, fencing, the presence of vegetation, and steep embankments. Water access to the river along the Belle Plant is also limited due to the lack of public boat launching areas in the reach adjacent to the site. The nearest public launching area is located over 10 miles downstream of the Belle Plant near Charleston, West Virginia.

Environmental data collected as part of the RFI were used to conduct a human health exposure assessment. These data and additional data collected for the SLERA were also used to conduct the SLERA (URS, 2011). As part of the human health exposure assessment, potentially complete exposure pathways for groundwater, surface soil, subsurface soil, and sediment were evaluated for potential receptors identified based on current and reasonably anticipated future land and water use. These include current/future on-site industrial workers, current/future on-site construction/excavation workers, trespassers, and recreational users of the Kanawha River. Based on an evaluation of site-specific exposure conditions, no significant potentially complete exposure pathways for human health were identified for the Mountain Area, including groundwater discharge to the Kanawha River. Although the human health exposure assessment did not identify any significant potentially complete exposure pathways, investigations recommended that the CMS include SWMUs 164 and 167 based on the historic slope stability issues at these waste areas. The open pit portion of SWMU 168 presents the potential for waste exposure to human and ecological receptors; therefore, SWMU 168 was recommended for consideration in the CMS.

The SLERA was conducted to evaluate SWMUs where releases were identified and other portions of the site where site-related constituents were detected at concentrations that exceeded ecological benchmarks and where potentially complete exposure pathways for ecological receptors were anticipated. Based on the results of the SLERA and subsequent SLERA-related investigations, potential ecological risks were identified only in two SWMUs (SWMUs 163 and 165). Spatial analysis of available data indicated that the potential risks in these two SWMUs were not extensive but were limited to portions or sections within the SWMUs (approximately 2.5 acres in SWMU 163 and less than one acre in SWMU 165).

During the CMS, a habitat assessment was performed by WHC for SWMU 165 to further support remedial decision-making. The results of the investigation of the SWMU 165 forest are supportive of a previously disturbed semi-natural habitat. The tree composition and diversity are

not identical to natural cold deciduous West Virginia forests in part due to the altered soil composition from the presence of fly ash and the presence of invasive species such as tree of heaven, which can be attributed to the process of natural succession in a disturbed open area. Although the forest habitat in SWMU 165 is not optimal, it is providing shelter, nesting, and food resources for wildlife. It is also in a relatively early successional state and will continue to mature.

B. Groundwater

Groundwater was sampled and analyzed as part of the RFI to evaluate area-wide groundwater quality (onsite and offsite) and potential impacts from SWMUs. Groundwater samples were analyzed for Appendix IX volatile organic compounds (VOCs), semi-volatile organic compounds (SVOCs), pesticides, herbicides, and metals, depending on the location and the sampling events.

Findings from the groundwater investigation support the hypothesis that a regional signature of benzene and other oil, gas, and fuel-related compounds exists in the groundwater of the aquifers beneath the Mountain Area and surrounding areas. A potential release of benzene into the C Zone aquifer has been identified in the northwest portion of the Mountain area. The concentrations of benzene in this area are relatively low [10 to 100 micrograms per liter (µg/L)] compared to the background benzene concentrations, which were detected as high as 580 µg/L. The location of the onsite potential release is consistent with the location of the Anaerobic Pond and/or other SWMUs as a potential source of the benzene release. The magnitudes of detections in the C Zone are less than the underlying A Zone, which is the direction of mass movement based on groundwater flow. Thus, the observed concentration trend does not support the ongoing downward movement of benzene, and the lower zones are already impacted more extensively by a regional source.

In addition, other COPCs identified in groundwater, some of which are potentially SWMU-related, include VOCs (2-hexanone, acetone, acrylonitrile, allyl chloride, chloroform, ethyl benzene, and xylenes), two SVOCs [1,4-dioxane and bis(2-ethylhexyl)phthalate], one pesticide (aldrin), and metals (total and dissolved arsenic, barium, cadmium, cobalt, nickel, and thallium; total antimony, lead, and zinc; and dissolved beryllium, copper, and vanadium).

To assess the significance of these detections, the Phase IIIB RFI included a statistical evaluation comparing onsite and offsite groundwater quality. The evaluation concluded that COPC concentrations observed in on-site groundwater are consistent with or less than concentrations in off-site groundwater. As a result, the presence of COPCs in Mountain Area groundwater is likely not indicative of a significant release from SWMUs in the Mountain Area.

C. SWMUs

- SWMU 162 – Former Waste Retention Reservoir - The RFI results confirmed the location of SWMU 162 and indicated no release to nearby Simmons Creek surface water and sediment. The presence of polycyclic aromatic hydrocarbons (PAHs) in surface soil at the SWMU is consistent with the cover soil (fill) placed on the unit and not the buried waste. Similarly, arsenic concentrations in surface soil were consistent with state-wide background values;

- SWMU 163 – Inactive Landfill and Liquid Incinerator - RFI results concluded that no significant release to soil occurred at the unit. Benzo(a)pyrene was detected slightly above the SL in one location, and arsenic concentrations were consistent with background. The SLERA concluded that potential ecological risk could not be dismissed for soil invertebrates and wildlife;

- SWMU 164 – Inactive Disposal Area 3 - in November 2003 a slope failure occurred at the upper portion of SWMU 164. The landslide occurred along a steep slope of the SWMU following a period of heavy rain. The cause of the failure was determined to be stormwater wash-out at the end of an existing culvert installed in a perimeter ditch along the access road. The culvert, perimeter ditch, and landslide area were repaired during February and March 2004;

- SWMU 165 – Inactive Disposal Area 4 – (13-Turn Landfill) - The SLERA conducted on the Mountain Area concluded that potential ecological risk could not be dismissed for soil invertebrates and wildlife;

- SWMU 167 – Former Upper Waste Retention Pond - Groundwater sampling results indicated a potential release from SWMU 167. 1,4-Dioxane, associated with waste materials in the unit, was detected above tap water SLs in one monitoring well (MW-93). Groundwater sampled from wells further downgradient delineated the impact. COPCs were identified in surface soil and subsurface soil at the unit. No significant potentially complete exposure pathways for human health were identified;

- SWMU 168 – Glycol Pit - It is believed that the pit is hydraulically connected to the adjacent Anaerobic Pond via groundwater. The southern portion of the SWMU contains solid wastes similar to the wastes found in SWMUs 163, 164, and 165 and is currently covered with soil. Groundwater sampling results indicate a potential release. 1,4-dioxane was detected above tap water SLs in groundwater;

- SWMU 170 – Former Plant Trash Incinerator - Based on an evaluation of site-specific exposure conditions, no significant potentially complete exposure pathways for human health or ecological risk were identified.

IV. Corrective Action Objectives

DEP has identified the following Corrective Action Objectives for soils and groundwater at the Mountain Area:

A. Soils

DEP has determined that soils do not pose an unacceptable human health risk for current industrial exposures; however exposure to subsurface soils may pose a potential unacceptable risk for future workers. The SLERA and additional ecological assessments conducted during the CMS indicate limited ecological impacts using conservative assumptions.

Therefore, DEP's Corrective Action Objective for the Mountain Area soils is to control

exposure to the hazardous constituents remaining in the subsurface by requiring compliance with and maintenance of land use restrictions and the implementation of engineering and storm water management controls.

B. Groundwater

DEP expects to return usable groundwater to its maximum beneficial use, which are generally levels acceptable for drinking. However, when waste is left in place, final cleanups should achieve groundwater cleanup levels at and beyond the waste unit boundary. Therefore DEP does not expect to clean up groundwater located within the boundaries of the waste management units to drinking water levels.

Further, DEP has determined that groundwater within the deeper aquifers of the Mountain Area are impacted by an offsite source and that individual SWMU's, while contributing to groundwater contamination, have lessor contaminant concentrations than current background conditions.

Therefore, DEP's Corrective Action Objectives for Mountain Area groundwater are to control exposure to the hazardous constituents remaining in the groundwater and to monitor the groundwater to confirm ongoing protection of human health and the environment.

V. Proposed Remedy

The proposed remedy for the Mountain Area consists of various combinations of Institutional and Engineering Controls (both existing and potential future controls), Stormwater Management, Capping, and Groundwater Monitoring, or No Further Action. Specifically the remedy for each SWMU consists of:

- SWMU 163 – Inactive Landfill and Liquid Incinerator - capping approximately 2 acres, institutional and engineering controls, stormwater management, and groundwater monitoring;

- SWMU 164 – Inactive Disposal Area 3 - stormwater management;

- SWMU 165 – Inactive Disposal Area 4 – (13-Turn Landfill) - partially capping approximately 1 acre, institutional and engineering controls, and stormwater management;

- SWMU 167 – Former Upper Waste Retention Pond - stormwater management is proposed and includes institutional and engineering controls and groundwater monitoring. This SWMU was previously capped as part of an interim measure;

- SWMU 168 – Glycol Pit - capping approximately 1.5 acres, institutional and engineering controls, stormwater management, and groundwater monitoring;

- Groundwater monitoring - proposed groundwater monitoring consists of select monitoring well sampling (existing site perimeter, onsite, and SWMU-specific wells). Analytical testing for VOCs, 1,4-dioxane, and total and dissolved metals will be performed during each sampling event. Sampling events are proposed every 3 years to monitor quality changes over time.

- For the following SWMUs, DEP has determined that there is no unacceptable risk to human health and the environment and no further action is proposed.

  SWMU 162 – Former Waste Retention Reservoir
  SWMU 170 – Former Plant Trash Incinerator

A. Land and Groundwater Use Restrictions

Because contaminants remain in the soil and groundwater at the Mountain Area above levels appropriate for residential use, DEP's proposed remedy requires land and groundwater use restrictions to restrict activities that may result in exposure to those contaminants. DEP proposes that the restrictions be implemented and maintained through institutional controls (ICs). ICs are non-engineered instruments, such as administrative and legal controls, that minimize the potential for human exposure to contamination and/or protect the integrity of a remedy by limiting land or resource use.

DEP is proposing the following land and groundwater use restrictions be implemented through ICs at the Mountain Area:

a) The Mountain Area shall not be used for residential purposes;
b) Groundwater at the Mountain Area shall not be used for any purpose, including, but not limited to, use as a potable water source, other than to conduct the maintenance and monitoring activities required by DEP and/or EPA;
c) All earth moving activities at the Mountain Area, including excavation, drilling and construction activities, shall be conducted in a manner such that the activity will not pose a threat to human health and the environment or adversely affect or interfere with the final remedy (and shall require development of a Soil Management Plan that includes appropriate Personal Protective Equipment requirements sufficient to meet DEP's acceptable risk and complies with all applicable OSHA requirements);
d) The Mountain Area shall not be used in a way that will adversely affect or interfere with the integrity and protectiveness of the final remedy.

The land and groundwater use restrictions necessary to prevent human exposure to contaminants at the Mountain Area will be implemented through enforceable ICs such as a permit and/or an Environmental Covenant pursuant to the West Virginia Uniform Environmental Covenants Act (WV Code Chapter 20 Article 22B). If DEP determines that additional maintenance and monitoring activities, institutional controls, or other corrective actions are necessary to protect human health or the environment, DEP has the authority to require and enforce such additional corrective actions through an enforceable mechanism which may include a permit or Environmental Covenant, provided any necessary public participation requirements are met.

VI. Evaluation of Proposed Remedy

This section provides a description of the criteria DEP used to evaluate the proposed remedy consistent with EPA guidance, "Corrective Action for Releases from Solid Waste Management Units at Hazardous Waste Management Facilities; Proposed Rule," 61 Federal Register 19431, May 1, 1996. The criteria are applied in two phases. In the first phase, DEP

evaluates three decision threshold criteria as general goals. In the second phase, for those remedies which meet the threshold criteria, DEP then evaluates seven balancing criteria to determine which proposed remedy alternative provides the best relative combination of attributes.

A. Threshold Criteria

1. Protect Human Health and the Environment - This criterion is met without additional remedial actions with respect to current risk. Engineering controls are currently in place to restrict access to the site and prevent disturbance of soil and waste to prevent exposure. The controls include a fence and security controls, an excavation permitting program, and an established health and safety plan (HASP). The proposed remedy will continue to protect human health and the environment from exposure to contamination, including future risks. Land and groundwater use restrictions will prohibit future uses that would pose an unacceptable risk through the use of an environmental covenant or other administrative mechanism. Capping and stormwater management will prevent future exposure of underlying waste materials.

2. Achieve Media Cleanup Objectives - DEP's proposed remedy meets the cleanup objectives appropriate for the expected current and reasonably anticipated future land use. The proposed remedy meets the cleanup standards for current and future use of the land and groundwater, since the proposed remedy provides that all uses of the land are related to maintenance of the remedy and groundwater use is prohibited. No on-site receptors exist for groundwater. The use restrictions will eliminate future unacceptable exposures to both soil and groundwater.

3. Control the Source of Releases - In its RCRA Corrective Action proposed remedies, DEP seeks to eliminate or reduce further releases of hazardous wastes or hazardous constituents that may pose a threat to human health and the environment. Minor releases occurred during the approximately sixty years the Facility used and maintained the Mountain Area. Removal of the waste materials are impractical and current controls, future controls, and the proposed remedy eliminate exposure, potential future releases and unacceptable risk.

B. Balancing/Evaluation Criteria

1. Long-Term Reliability and Effectiveness - The proposed remedy of containment will maintain protection of human health and the environment over time by controlling exposure to the hazardous constituents remaining in soils and groundwater. The long term effectiveness is high, as ECs and ICs are readily implementable and easily maintained. The capping and stormwater management are easily maintained and highly effective in the long run.

2. Reduction of Toxicity, Mobility, or Volume of Waste - The proposed remedy is not designed to reduce the toxicity or volume of waste. Wastes were placed in the Mountain Area beginning decades ago prior to environmental regulation and the objective of the remedy is to eliminate exposure and risk to human health and the environment, which it will. The wastes are immobile.

3. Short-Term Effectiveness - The Mountain Area is enclosed by fencing, which restricts access. Groundwater is not used for any purposes other than monitoring or maintenance; therefore the proposed remedy's short-term effectiveness is high.

4. Implementability - DEP's proposed remedy is readily implementable. The remedy will be implemented using existing monitoring wells and existing controls. DEP proposes that the ICs be implemented through an enforceable mechanism such as the permit and/or an Environmental Covenant pursuant to the West Virginia Uniform Environmental Covenants Act. Therefore, DEP does not anticipate any regulatory constraints in implementing its proposed remedy. Furthermore the proposed remedy consisting of additional capping and stormwater management are easily completed using well-known earth-moving technology.

5. Cost - The total cost for the proposed SWMU remedies ranges from $7.2 million to $9.8 million in capital cost and $265,000 to $360,000 in annual O&M cost. This cost range should be considered an order-of-magnitude estimate. Cost estimates will be updated in the design phase when more information is available.

6. Community Acceptance – Chemours currently meets with a Community Advisory Panel to foster an open dialogue, an exchange of ideas, better understanding and cooperation with the surrounding community regarding safety, and environmental protection programs. There have been no known conflicts within the community regarding the investigation and remediation efforts. Ultimately, community acceptance of DEP's proposed remedy will be evaluated based on comments received during the public comment period and will be described in the Final Decision and Response to Comments.

7. State/Support Agency Acceptance - WVDEP has reviewed and concurred with the proposed remedy for the Mountain Area. Furthermore, EPA has provided input and been involved throughout the investigation process.

VII. Financial Assurance

Chemours will be required to demonstrate and maintain financial assurance for completion of the remedy pursuant to the standards contained in West Virginia regulations.

VIII. Public Participation

Interested persons are invited to comment on DEP's proposed remedy. The public comment period will last thirty (30) calendar days from the date that notice of the start of the comment period is published in a local newspaper. Comments may be submitted by mail, fax, e-mail, or phone to Charles Armstead at the address listed below.

A public hearing will be held upon request. Requests for a public hearing should be made to Charles Armstead of the WVDEP Office by phone 304-926-0499 ext. 1130 or by email at charles.w.armstead@wv.gov. A hearing will not be scheduled unless one is requested.

DEP may modify the proposed remedy based on new information and/or public comments. Therefore, the public is encouraged to review the Administrative Record and to comment on the proposed remedy presented in this document.

The Administrative Record contains all the information considered by DEP for the proposed remedy at this Facility. The Administrative Record is available to the public for review

and can be found at the following location:

West Virginia Department of Environmental Protection
601 57th Street SE
Charleston, WV 25304
Contact: Charles Armstead
Phone: (304) 926-0499 ext. 1130
charles.w.armstead@wv.gov

Attachment 1 Administrative Record File Index of Documents
Figure 1 Site Location Map
Figure 2 Site Map

ATTACHMENT 1

STATEMENT OF BASIS
ADMINISTRATIVE RECORD FILE
INDEX OF DOCUMENTS

DERS. 1992. *Mountain Area Phase III Hydrogeologic Investigation*. DuPont Belle Plant, Belle, West Virginia. August 10, 1992.

DuPont CRG. 2009. *Phase IIIA RFI Report*. DuPont Belle Plant, Belle, West Virginia. September 2009.

DuPont CRG. 2004. *Technical Memorandum Belle Groundwater Model*. DuPont Belle Plant, Belle, West Virginia. May 2004.

DuPont CRG. 1999. *Current Conditions Report*. DuPont Belle Plant, Belle, West Virginia. February 26, 1999.

EPA. 1994. *RCRA Corrective Action Plan, Final*. EPA 520-R-94-004, OSWER Directive 9902.3-2A. May 1994.

EPA. 1998. *Final Permit for Corrective Action and Waste Minimization*. E.I. DuPont de Nemours and Company, Belle, West Virginia (Permit Number WV D005012851). September 30, 1998.

EPA. 2000. *Office of Solid Waste Fact Sheet #3 Final Remedy Selection for Results-Based RCRA Corrective Action*. March 2000.

URS. 2011. *Phase IIIB RFI Report.* DuPont Belle Plant, Belle, West Virginia. November 2011.

URS. 2013a. *Mountain Area Screening Level Ecological Risk Assessment (SLERA)*. DuPont Belle Plant, Belle, West Virginia. January 2013.

URS. 2013b. *Belle Mountain Area Corrective Measures Study Work Plan*. DuPont Belle Plant, Belle. West Virginia. June 2013.

WVDEP. 2014. *RCRA Operating Permit WVD 005 851*, DuPont Belle Plant, Belle West Virginia. March 6, 2014.